

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

NIKKI STEINER MAZZOCCHIO, et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 4:22-cv-00292-MTS
	)	
COTTER CORPORATION, et al.,	)	
	)	
Defendants.	)	

**DEFENDANT ST. LOUIS AIRPORT AUTHORITY’S MOTION TO JOIN**  
**DEFENDANT COTTER CORPORATION (N.S.L.)’S MOTION FOR**  
**CERTIFICATION FOR INTERLOCUTORY APPEAL**

COMES NOW Defendant, St. Louis Airport Authority (“SLAA”), a Department of the City of St. Louis, by and through the undersigned counsel, and joins in the previously filed *Motion for Certification for Interlocutory Appeal* (ECF #100) and *Memorandum in Support of Motion for Certification for Interlocutory Appeal* (ECF #101) dated September 28, 2023. For the reasons set forth therein, the undersigned requests that this Court certify the controlling question of law raised in this Court’s Memorandum and Order (ECF #85) with respect to the standard of care applicable to a PAA public liability action under 28 U.S.C. § 1292(b), and further requests that the proceedings be stayed pending the Eighth Circuit’s review. As the Memorandum and Order (ECF #85) explains, there are substantial grounds for a difference of opinion on this legal issue, and resolution now by the Eighth Circuit may materially advance the ultimate termination of this litigation. Accordingly, this Court “should not hesitate to certify an interlocutory appeal.” *Mohawk Indus., Inc. v. Carpenter*, 558 U.S. 100, 110-11 (2009).

Dated: October 25, 2023

ARMSTRONG TEASDALE LLP

By: /s/ Corey A.-T. Stegeman

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DEPARTMENT OF THE CITY OF ST. LOUIS.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 25, 2023, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Corey A.-T. Stegeman